



Nuclear Energy Information Service

Illinois' Nuclear Power Watchdog since 1981

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November 17, 2010

TO: Blue Ribbon Commission on the Future of Nuclear Power in America
FR: Dave Kraft, Director
RE: questions to the Commission at 4th meeting of BRC 11/16/2010

Greetings Commissioners,

At the end of the meeting in Washington, D.C., held on November 16th, I presented a series of 5 recommendations and questions to the BRC. I was asked after the meeting to submit them in written form for consideration. I do so below:

1.) EXAMPLES OF PUBLIC PROCESS IN U.S. WORTHY OF FURTHER STUDY:

I was a member of the Illinois Citizens Advisory Group on Low-Level Radioactive waste from ~1986-1990. Our job was to gather information on low-level radioactive waste (LLRW) treatment, management, storage and disposal; and to make recommendations to the Illinois Department of Nuclear Safety concerning the potential siting and construction of a proposed LLRW site for Illinois. The final result was that no site was needed, and hence none was constructed. What is important to this Commission was the public process developed over a period of years, which did many of the things reported by your team which visited Sweden recently, including (but not limited to):

- Establishing a Citizens Advisory Group with a diverse membership and range of areas of specialization
- Establishing funding for eventual intervenors
- Conducting numerous in-community educational events, workshops, and trainings
- Exploration of the use of “volunteer” sites for characterization

I would strongly suggest contacting the **Illinois Department of Nuclear Safety** (which is now a sub-agency of Illinois Emergency Management Agency (IEMA)): <http://iema.illinois.gov/iema/dns.asp> ; They still retain some of the staff who were a part of that process, who perhaps could shed light on some of the things that worked or not.

2.) THOUGHT-QUESTION 1 – ABSENCE OF SOCIAL SCIENCES EXPERTISE:

The BRC itself is an impressive collection of expertise and skill sets. Yet, from both the short bios on the BRC website, and historic contact and experience with some of the members, it would be fair to say the BRC is stacked heavily with people who have training or expertise in a.) hard sciences and technology; 2.) politics and policy. In an effort to address the more “institutional/societal” issues it is researching, it seems the BRC has attempted to balance this absence with the testimonies of experts in the social science fields – sociology, demographics, geography, perhaps psychology. I found it ironic that the BRC directed so many questions to the safe-energy activist community dealing with creating institutions capable of dealing effectively with radioactive waste issues, yet itself had no experts on the Commission to either provide such information, or evaluate the information your presenters provide. Nor am I aware that the BRC has asked Secretary Chu to correct this weakness.

This deficit is a serious one. While you may be emphasizing technological solutions in your final recommendations, I would point out the inadequacy of that approach. For example, in her comments Susan Corbett of South Carolina Sierra Club went to great lengths to describe the characteristics of the “company town” the present nuclear industry has created there, many of which are negative. Consider this question: what technology can you recommend that mitigates the effects of the company town mentality on safety? You will find that in many instances, technology will not be able to address institutional inadequacies by itself; and that the interrelationships between the two are complex, and often not as easily predictable as those in the so-called hard sciences.

3.) THOUGHT QUESTION 2 – THOROUGH AND COMPLETE INVESTIGATION:

Given the great latitude that Secretary Chu gave the BRC in his March remarks to you, to allow you free rein to explore how front-end cycle choices and options can affect back-end outputs, what NON-nuclear technologies and your thoroughly investigating that will decrease or eliminate nuclear waste creation?

4.) THOROUGH ANALYSIS OF THE HOSS OPTION GIVEN TO YOU BY TODAY'S TESTIMONIES:

Will the BRC conduct a cradle-to-grave cost-benefit analysis comparing HOSS (hardened-onsite storage) to other back-end options, such as reprocessing?

5.) QUESTIONABLE INSTITUTIONAL CONFIDENCE:

A recent article in the trade publication *Inside EPA* uncovered a one-year secret dialog among NRC, EPA and FEMA that shows a breakdown in agreement among these agencies critical to radwaste management and treatment over which agency (if any!) had either responsibility or jurisdiction in mitigating long-term accident and clean-up consequences in the event of a severe reactor accident. One can assume that this same level of disagreement must surely exist among these agencies regarding 1.) transport accidents; 2.) accidents at interim storage facilities; 3.) reprocessing and other non-reactor nuclear facilities, and 4.) permanent isolation/disposal facilities.

With no agency assuming this responsibility, what does that do to change the confidence level of the BRC in terms of adequate institutional care of high-level radioactive wastes (HLRW) for the long-term? In the absence of such regulatory responsibility, and by extension waste confidence, can any back-end recommendations that allow for continued, increasing amounts of HLRW production be considered responsible ones? Ethical ones? If the agencies of today which have had a role of creating and managing these wastes profess no ability, interest or obligation in mitigating the long-term consequences of such accidents, what justification exists for adding to this ever growing burden?

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We thank you for your consideration of these questions, and will look forward to your written responses to them in the draft of your final report in 2011.